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## UNITED STATES ENVIRONMENTAL PROTECTION A.

REGION 8

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DENVER, CO 80202-2466

<http://www.epa.gov/region08>

Ref: EPR-ER

To: Lisa Walker  
ERRS Contract Officer, EPA Region 8

From: Craig Myers *Floyd D. Myers, OSC, 5/17/04*  
OSC, EPA Region 8 Emergency Response Team

Re: ERRS Specialized Personnel Request #2 for the Vermiculite Intermountain TCRA.

ER should be allowed to mobilize personnel from Libby for the following reasons.

1.) The timeframe EPA originally outlined for ER to clean the Artistic Printing building has been significantly shortened by the owner since the project started. EPA also pushed up the timeframe for cleaning the Frank Edwards Building (FEB). It was originally planned that we would clean this building after we were finished with Artistic Printing. However, due to the terms of the access agreement with the owners of the FEB, we have had to begin preparing the building for cleaning sooner than that. The two of these situations combined place a workload on ER that cannot be accommodated by the size of crew that they have on site.

2.) ER has been advertising positions for a month now, with little or no response from local workers. A large part of their crew has been hired locally, with only the five personnel requested earlier being brought down from Libby. It seems that they have exhausted the local pool of trained asbestos workers. They could hire untrained workers and train them, but they don't have the time to conduct a 40 hr class before the workers are going to be needed.

3.) If ER is not able to increase staffing levels during the 11 day period Artistic Printing is shutdown, it is probable that we will not meet the June 1<sup>st</sup> deadline to have Artistic Printing back up and running. If this happens, there could be substantial economic harm to the business.

